

## Exhibit 20



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**Via Email**

Michael Nemelka  
Kellogg, Hansen, Todd, Figel & Frederick, PLLC  
1615 M Street, N.W., Ste. 400  
Washington, D.C. 20036-3215

Re: *In re: Dealer Management System Antitrust Litigation*, C.A. No. 18-C-864, MDL  
No. 2817 (N.D. Ill.)

Dear Mike,

I write to follow up on open issues from our January 18 call.

**Slack.** We appreciate Authenticom's recent production of communications from Slack. However, that production has several immediately discernible deficiencies (and may have additional deficiencies that we have not yet been able to identify on a first-cut review). First, many of the produced chat chains do not properly display the names of chat participants, and instead display alphanumeric "unknown user" codes (for example, and without limitation, AUTH\_00472249; AUTH\_00472253; AUTH\_00472253; AUTH\_00472311). The identity of the various participants in Slack conversations is centrally important, and we are entitled to know who the identifiable individuals in the conversation were conversing with. Second, it does not appear that any of the conversations produced include Steve Cottrell as a participant (or, if they do, Mr. Cottrell's name is improperly rendered as an alphanumeric "unknown user," making it impossible for us to identify his communications). Mr. Cottrell's Slack communications were part of the compromise that my colleague's letter of December 18, 2012 proposed, which compromise Authenticom purported to accept. Additionally, as with Authenticom's previous production of Slack conversations, the recently produced files do not display images pasted into the chat chain. Please promptly correct these deficiencies and produce an overlay production that accurately renders the participants in and content of the produced Slack conversations.

**Videos and Demonstrations.** You indicated that Authenticom was still searching for the videos and demonstrations referenced in Mr. Munns's deposition. Please update us on when we can expect production of those materials.

**Archer.** We continue to believe that documents from Authenticom's Archer platform that are linked in otherwise responsive emails should be regarded as attachments to those emails and produced accordingly. The attached spreadsheet shows what we believe are the bulk of documents in Authenticom's production that contain links to the Archer platform. The spreadsheet is provided

solely as a courtesy and we reserve all of our rights with respect to materials inadvertently omitted therefrom. We request that you collect and produce all Archer materials linked in any produced document.

**Archway.** On our call, you indicated that, while Authenticom had collected, reviewed, and produced documents from the Archway platform. However, you could not confirm that all Archway documents linked in responsive emails had been produced. We have investigated, and it appears that there are many examples of Archway links for which there is no obvious corresponding document in Authenticom's noncustodial productions.<sup>1</sup> As you can tell from reading the text of the links, there are some examples for which there is not even a readable file or page name that we could search against. Please produce all Archway materials linked in otherwise responsive emails.

**PCM Log.** On our call, you indicated that Authenticom was still working toward production of an exemplar PCM Log. Please update us on when we can expect production of a log.

Sincerely,

/s/Justin D. Patrick

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<sup>1</sup> E.g., AUTH\_0092784 (linking to <https://archway.authenticom.com/pages/viewpage.action?pageId=22675508>); AUTH\_00089693 (linking to <https://archway.authenticom.com/display/DEV/Polling+Server+Status+Report>); AUTH\_00055758 (linking to <https://archway.authenticom.com/download/attachments/3768963/How%20to%20Manually%20Change%20Primary%20CAPTCHA%20Providers.docx?api=v2>); AUTH\_00080041 (linking to <https://archway.authenticom.com/display/PRD/CDK+Locked+Profiles+Calling+Script>); AUTH\_00065406 (linking to <https://archway.authenticom.com/display/DEV/DynamicReporting+Report+Template+Format>); AUTH\_00318132 (linking to <https://archway.authenticom.com/display/MRKT/DealerVault+Marketing+Plan+4th+Qtr+2014>); AUTH\_00110448 & attachment to AUTH\_00108903 both linking (<https://archway.authenticom.com/display/DEV/DealerVault+Recurring+Delivery+Failures>).